

McElroy, Deutsch, Mulvaney & Carpenter, LLP
88 Pine Street – 24th Floor
New York, New York 10005
(212) 483-9490
Scott A. Levin

Attorneys for Plaintiff,
The Travelers Indemnity Company

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE TRAVELERS INDEMNITY COMPANY, :
SUCCESSOR IN INTEREST BY MERGER TO :
GULF INSURANCE COMPANY, :
Plaintiff, : Civil Action No.: 07-CV-4032
- against - : (NRB)
MODERN INDUSTRIES, INC., RONEN KOZOKHAR :
and ALLA KRASNER :

**NOTICE OF MOTION
FOR DEFAULT JUDGMENT
AGAINST MODERN
INDUSTRIES, INC.**

X

TO: Modern Industries, Inc.
120 49th Street
Brooklyn, New York 11232

Alla Krasner
c/o Michael A. Freeman, Esq.
24 West 40th Street, 17th Floor
New York, New York 10018

Ronen Kozokhar
c/o Michael Sucher, Esq.
26 Court Street
Brooklyn, New York 11242

PLEASE TAKE NOTICE that, on March 28, 2008, or as soon as counsel may be heard, the undersigned, attorneys for plaintiff, The Travelers Indemnity Company, successor in interest by merger to Gulf Insurance Company (“Travelers”), will move before the Hon. Naomi R.

Buchwald, U.S.D.J., at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, 10007, for an Order granting final judgment by default against defendant, Modern Industries, Inc.; and

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, Travelers shall rely upon the Complaint filed in this matter, the Request to Enter Default against defendant, Modern Industries, Inc. dated August 6, 2007, the Clerk's Certificate of Default dated January 22, 2008 and the Affidavit of R. Jeffrey Olson in support of the present motion; and

PLEASE TAKE FURTHER NOTICE that at the time and place aforesaid, Travelers will request that the proposed form of final judgment submitted herewith be entered by the Court.

McElroy, Deutsch, Mulvaney
& Carpenter, LLP
Attorneys for Plaintiff,
The Travelers Indemnity Company,
successor in interest by merger to
Gulf Insurance Company



Scott A. Levin

Dated: New York, New York
February 11, 2008